



Fw: Response to DEQ Comments on the Gasco Draft Groundwater SCMs Design

Sean Sheldrake to: bayuk.dana

11/16/2011 10:58 AM

Cc: PetersonLE

Bcc: Mark Ader, Chip Humphrey, Kristine Koch, Sean Sheldrake, Richard Muza, Rene Fuentes

Dana,

Please see EPA's comments attached on these latest responses. Let us know if you have any questions, or if you would prefer if EPA conveyed these directly to NWN.

Thank you.

S

1 attachment



Response to GASCO Draft Final Design Responses (16-NOV-2011).docx

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Region 10 Dive Team: <http://www.epa.gov/region10/dive>

Portland Harbor Cleanup: <http://www.epa.gov/region10/portlandharbor>

Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>

Green Cleanups (EPA only):

<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>

Health and Safety (EPA only): <http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/H&Sec1>

Deliveries: Parking Garage mailroom (1st floor)

Visitors: Check-in @ PERC / Service Center on 12th floor:

<http://yosemite.epa.gov/r10/extaff.nsf/Homepage/Visiting+Seattle>

----- Forwarded by Sean Sheldrake/R10/USEPA/US on 11/04/2011 04:31 PM -----

From: John Edwards <jedwards@anchorqea.com>
To: Dana Bayuk <BAYUK.Dana@deq.state.or.us>
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Date: 11/04/2011 01:54 PM
Subject: RE: Response to DEQ Comments on the Gasco Draft Groundwater SCMs Design

Hello Dana.

The attached PDF contains NW Natural's response to DEQ's September 22, 2011 Comments on the May, 2011 Gasco Groundwater Source Control Design Report. We appreciate the effort required to prepare the detailed reviews provided by DEQ and EPA. The response letter and attachments present a detailed plan to complete source control design in an expedited manner that will achieve the groundwater source control objectives and provide timely input to the design of the sediment remedy. This design approach was presented informally to DEQ and EPA in an October 5 meeting.

NW Natural would appreciate a decision from DEQ on this proposed design plan within two weeks.

A hard copy will be sent to DEQ next week.

Please feel free to contact us with questions regarding this e-mail and/or attachments.

John

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From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]

Sent: Thursday, September 22, 2011 3:03 PM

To: Bob Wyatt

Cc: Patty Dost; John Edwards; Ben Hung; Carl Stivers; Rob Ede; 'Burr, Myron'; Tom McCue; 'Gladstone, Alan'; James Peale; Ted Wall; 'Budai, Christine M NWP'; Mark Ader (Ader.Mark@epa.gov); Chip Humphrey (humphrey.chip@epa.gov); Kristine Koch (koch.kristine@epa.gov); Sean Sheldrake; 'Peterson, Lance'; ANDERSON Jim M; BURKHART Robert; GAINER Tom; LARSEN Henning; MCCLINCY Matt

Subject: NW Natural, DEQ Comments on the Draft Groundwater SCMs Design

Hello Bob.

DEQ reviewed the "Draft Groundwater Source Control Final Design Report, NW Natural Gasco Site" dated May 2011 (Draft Groundwater SCMs Report). Soft copies of our comments letter and attachment are provided below.

In addition, soft copies of EPA's comments and the ACOE's letter are attached.

A signed hard copy of DEQ's letter and attachments will be sent to you via regular mail this week.

The Draft Groundwater SCMs Design proposes designs for groundwater source control measures (SCMs) along the shoreline of the property owned by NW Natural and the northern portion of the property owned by Siltronic Corporation. The primary purpose of the attached letter is to inform NW Natural that based on our review of the document, DEQ:

- Acknowledges the principal elements of groundwater source control are presented in the document, including SCMs designs for the Fill WBZ and Alluvium WBZ;
- Accepts the Draft Groundwater SCMs Design as the Revised Interim Design Report;
- Does not accept the Revised Interim Design Report as a 100% design document (i.e., a construction-ready submittal); and
- Approves NW Natural moving forward with the final groundwater SCMs design process for the Fill WBZ interceptor trench and the Alluvium WBZ HC&C system along shoreline segments 1 and 2.

The next step in the final groundwater SCMs design process is for NW Natural to prepare and submit the Draft Final Groundwater SCMs Design for DEQ review and approval that: 1) incorporates the groundwater SCMs design information, evaluations, and modifications indicated by DEQ; and 2) responds to EPA and DEQ comments. The Draft Final Groundwater SCMs Design and response to comments should be submitted to EPA and DEQ for review within 45 days of NW Natural's receipt of the attached comments.

DEQ acknowledges the work NW Natural performed to develop a SCM design for the Fill WBZ and redesign the HC&C system along the portion of Segment 1 where DNAPL occurs.

Please feel free to contact me with questions regarding this e-mail and/or attachments.

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